1C

Information/Action

General Session

Executive Director's Report

Executive Summary: This agenda item considers findings and recommendations in the LAO report titled *Modernizing the Functions of the Commission on Teacher Credentialing.*

Recommended Action: None

Presenter: Dr. Sam Swofford, Executive Director, and Rod Santiago, Consultant, Office of Governmental Relations

Strategic Plan Goal: 4

Continue effective and appropriate involvement of the Commission with policymakers on key education issues

- Collaborate with and advise appropriate agencies
- Design and develop strategies to implement new legislation

Executive Director's Report

Consideration of A Report By the Legislative Analyst's Office

Introduction

At its May/June 2006 meeting the Commission briefly discussed an April 2006 report by the Legislative Analyst's Office entitled *Modernizing the Functions of the Commission on Teacher Credentialing*. The report makes several findings and recommendations regarding the work of the Commission including moving many of its duties to local and other state agencies and replacing the Commission with an advisory committee. This item comments on some of the findings and recommendations found in the report. We anticipate this information will be needed to inform the discussions that take place as a result of the *Supplemental Report of the 2006 Budget Act 2006-07 Fiscal Year* which calls for the Assembly Education Committee and Senate Education Committee to convene a working group to undertake major teacher credential and accreditation reform.

Executive Summary
Modernizing the Functions of the Commission on Teacher Credentialing
A Report by the LAO
CCTC Comments

LAO Recommendation	CCTC Comments
Accrediting Teacher Preparation Programs	
• Accredits each individual teacher preparation program. • Makes accreditation decisions on each program annually based upon five specific outcomes.	Since June 2004, an accreditation review group (primarily made up of stakeholders) has been meeting to develop and propose revisions to the existing accreditation system. The recommendations will be presented to the Commission at its July/August 2006 meeting for possible adoption. The new model proposes biennial reporting data related to candidate outcomes using multiple measures which include retention rates and employer satisfaction as well as site visits, along with adherence to adopted program standards which include a focus on the K-12 student content standards. Discussions by the accreditation review group concluded that an accreditation decision based on a small number of quantitative measures alone, such as the LAO proposal, would be insufficient to reach any defensible conclusions about the quality of an institution's programs.
Credentialing Teachers	
• Issues only initial credentials and only for broad categories of teachers and in broad subject areas. • Reviews credential applications one time at university or county level.	Credentials are already issued in broad subject areas. Additional authorizations have been added to conform to the Federal legislation, No Child Left Behind. University recommended credentials and renewals are currently being processed through an online system that issues credentials in less than 10 days, thus eliminating redundancy or the need for Temporary County Certificates. Having the CCTC issue the credential provides consistency across the process, and helps to reduce fraud. This would also provide a single source for credential data.
Monitoring Teacher Conduct	
• Fingerprint teachers one time (at county level) • Shift monitoring functions to California Department of Education and State Board of Education (SBE). • Relies on lower cost in-house counsel.	CCTC has discretionary review and investigative authority that county offices do not have. Also the CCTC has access to FBI information and data from other states that have taken adverse action and non criminal review. The Committee of Credentials affords the applicant several levels of due process rights. The current process does not impact the General Fund. The LAO recommendation to shift monitoring functions to the CDE/SBE will have an impact on the General Fund.

Modernizing the Functions of the Commission on Teacher Credentialing
A Report by the LAO (April 27, 2006)

CCTC Comments

Accrediting Teacher Preparation Programs

LAO Issue	CCTC Comments
A New Performance Based Accreditation System Should Be Established	**CCTC is considering a new performance-based accreditation system.** In June 2004, the CCTC convened an accreditation review group (primarily made up of stakeholders) to develop and propose revisions to the existing accreditation system. In October 2005, the CCTC directed that the new model for accreditation be sent out for stakeholder review. This new model incorporates outcomes based accreditation, while maintaining the importance of standards that define a quality program. In this new model, biennial reporting data related to candidate outcomes would be required from every institution offering credentialing programs. This outcomes data serves as a critical information source for the accreditation process and for determining whether there are any areas of concern that merit a site visit sooner than scheduled.
Current System Almost Entirely Input Oriented	**Outcome based data is the cornerstone of the CCTC accreditation review group proposed accreditation system.** The current accreditation system considers both input and output measures. The accreditation review group agreed early on in the review process that the current system needed improvement and that the revised model needed to incorporate outcomes based measures. As a result, biennial reporting was developed that would be entirely related to candidate outcomes data and would serve as a major component in accreditation decisions.
Standards Are Vague, Reviews Subjective	**The CCTC proposed system would be based on revised common standards focused more directly on candidate outcomes and the SB 2042 program standards.** The LAO report bases much of its accreditation comments on the American Institutes for Research (AIR) report. Since the AIR report was conducted prior to the full implementation of the SB 2042 standards, it would not be a useful tool for analysis of the current system. The current SB 2042 program standards are much more specific than previous standards, especially given the addition of "required elements" within the standards. The accreditation review group supports the need to update CCTC's common institutional standards. They are currently in the process of developing language that would be more specific and more focused on candidate outcomes data.

Accrediting Teacher Preparation Programs (continued)

LAO Issue	CCTC Comments
Accreditation Reviews Occur Too Infrequently	**The proposed system provides more frequent outcome based data and a more rigorous follow-up process.** Early on in the process, the accreditation review group determined that accreditation activities occur too infrequently and that accreditation must be transformed from a one-time event into an on-going process. As a result, they developed a proposed structure that would require biennial reports focused on outcomes data, a 4th year program document review, and a 6th year focused site visit. In addition, the proposal includes a much more rigorous follow up process allowing more flexibility to ensure that the institution has rectified any inadequacies in their programs.
Current Process Focuses on Institutions, Not Programs	**The proposed system focuses on both program findings and institutional findings.** The current reviews focus on both the institution as a whole and its individual preparation programs. The accreditation review group sought feedback on this particular issue from institutional representatives. The review group's proposal includes maintaining the focus of accreditation on institutions, thereby allowing institutional representatives the leverage they need to bring about improvements from departments outside of their authority, while improving the manner in which results are reported for individual programs. Under the proposed new system, standard program findings would be reported for each program an institution offers in addition to the institutional, or unit, decision.
Quality of Information Varies Significantly	**The proposed system reports similar institutional data.** Under the accreditation review group's proposed new structure, all institutions and programs would submit biennial candidate outcomes data that would be very similar from institution to institution. It is anticipated that test scores, retention data, employer and candidate survey data would be common among all reports.
System Should Include Annual Summary Data	**The proposed system would report biennially as one measure of program and institutional quality.** The accreditation review group agreed that all institutions and programs should be collecting and analyzing outcomes data annually and that analysis of that data should serve as the basis for program improvement. Interim reporting of that data was endorsed by the accreditation review group, however the group opted for biennial, rather than annual summary data by programs and institutions. In addition to the biennial reporting of the data, institutions would be required to submit information about how that data was used to make programmatic improvements.

System Should Include Annual Summary Data (continued)	The LAO proposal bases accreditation decisions solely on five specific data sources. The accreditation review group determined that, while the outcome measures currently available are informative and critical to the process, they are not sufficient by themselves to justify an accreditation decision. The group concluded that accreditation should be based on multiple measures, including a site visit, and adherence to all program standards.
Use of State's Teacher Data System	**The proposed system allows for incorporation into a teacher data system.** A Teacher Data System is not currently operational. If the Teacher Data System is able to yield useful information on the quality of programs at an institution, it would be considered for use in the accreditation system.
Make Results Easily Accessible	**The proposed system calls for clearer program findings in the accreditation report.** Accreditation reports are currently public documents. Findings on individual programs and the institution would be clearer under the review group's proposal. Candidate outcomes data included in biennial reports from institutions and each credential program will be public information as will accreditation site visit reports and accreditation decisions. Program findings will be more clearly included in the revised accreditation report allowing weaknesses in programs to be more explicitly identified, documented, and addressed.
Annual Accreditation Decisions Would Be Based on Five Specific Measures	**LAO accreditation measures, while important, are insufficient to make accreditation decisions.** The performance based system the LAO advocates includes five specific measures. The review group's proposal includes 2 of the LAO measures, retention rates and employer satisfaction, among the types of data that will be collected biennially. However, the accreditation review group believes that multiple measures, including a site visit, along with adherence to standards more accurately reflect the quality and effectiveness of a program. Discussions by the accreditation review group concluded that an accreditation decision based on a small number of quantitative measures alone, such as the LAO proposal, would be insufficient to reach any defensible conclusions about the quality of an institution's programs.
LAO Proposal Would Result in Net Savings to State	**LAO proposal shifts costs from special funds to the state's General Fund** The LAO proposal would shift the accreditation function from a fee based system (CCTC) to a General Fund (CDE/SBE) agency. Currently, the accreditation system is not a cost to the General Fund.

Accrediting Teacher Preparation Programs (continued)

LAO Issue	CCTC Comments
New System Likely to Reduce Local Costs	**LAO proposal might save on local costs at the expense of quality assurance.** The LAO's proposed 5 data sources reporting could result in a local IHE cost savings, however the discussions of the accreditation review group suggest that such a structure would be inadequate for determining the quality of an institution's preparation program.
CDE Staff and SBE Would Make Accreditation Decisions	**LAO proposal shifts accreditation decisions from professional educators to state bureaucrats** The LAO proposal eliminates professional judgment, which is an essential feature in an accreditation process, and would remove the decision-making process from K-12 and higher education practitioners. Currently, review teams are composed of K-12 and higher education practitioners. In addition, the Committee on Accreditation is composed of 6 K-12 educators and 6 educators from institutions of higher education. This vests the responsibility of making decisions about educator preparation programs with professional educators.

Credentialing Teachers

LAO Issue	CCTC Comments
Dizzying Array of Documents.	**Credentials are established through Legislative directive.** All credentials are authorized by statute and while there may appear to be many types of credentials, they exist at the request of the Legislature and stakeholders. Moreover, in the interest of removing barriers for teachers entering the teaching profession, the Legislature has established multiple routes for earning a credential.
Teachers Face Credential Labyrinth	**Teachers are required to demonstrate mastery of subject matter and teaching ability.** Federal and state policy makers have determined that teachers need to be competent in the subject matter they teach. Since the 1960's California has required that teachers must either pass an exam or complete a university-based subject matter program in the subject they plan to teach. The CCTC charges one fee per application. It is important to note that each application may include multiple authorizations. Assuming the candidate qualifies for each of the authorizations, the candidate is assessed one fee for the application. If the candidate wishes to add additional authorizations at a later time an additional fee is charged because there is an evaluation required for the additional authorization.

LAO Issue	CCTC Comments
Labor-Intensive and Time-Consuming Application Process	**CCTC's new application processes will eliminate the application backlog.** Regulations give the CCTC 75-working days to process an application. Until FY 2004-05 the CCTC met that requirement. However in 2004-05 the Certification Division's staff was reduced by 9%, yet the workload only dropped 1%. In FY 2004-05, the CCTC implemented a new computer processing system. The transition to the new system coupled with a reduction in staff resulted in a delay in processing paper applications. However, the new technology allowed teachers to renew credentials online and universities to recommend applications online and the CCTC now processes these online applications within 5 to 10 working days. During April 2006, 49% of all applications were submitted online.
Credential Process Riddled with Redundancies	**University recommended applications are processed in 5 to 10 days.** The LAO report states that it takes 116 days to process applications submitted by colleges and universities. As part of the 2005-06 Budget Act, colleges and universities were required to submit all applications online. As a result in October 2005, universities began submitting applications online and the 116 days has been reduced to 5 to 10 days.
Counties Have Devised Own Licensing System	**The Temporary County Certificate is not the same as state licensure.** The LAO report equates the Temporary County Certificate (TCC) process to issuing credentials. The TCC process was developed to allow employing agencies to place individuals in a classroom on an emergency basis. The LAO report states that counties issue TCCs for almost every credential renewal. The CCTC has offered an online renewal process for four years with a processing time of 5 to 10 days, thus eliminating the need for TCCs for renewal. With the advent of college and university online applications and online renewals, the need for TCCs will be greatly reduced for initial hires. In fact there should be no need for a TCC for credentials being recommended by a college or university.
Simplifying Credential Requirements	**LAO recommendation would actually make credential requirements more complex.** The recommendation by the LAO basically restates the current credential structure. Credentials are already issued in broad categories and the state already funds two years of induction for new teachers. The LAO proposal does not take into account the No Child Left Behind requirement for Highly Qualified Teachers (HQT) that states the teacher must have a major in the specific subject they teach. It does not allow staff development to meet the HQT requirement. On page 16 of the report it states that teachers must go through a labyrinth to be credentialed. Based on the LAO recommendation, a teacher would have to basically be recertified each time he or she changes districts and counties.

Credentialing Teachers (continued)

LAO Issue	CCTC Comments
Devolve Most Credentialing Responsibility to Universities	**LAO recommendation would not further simplify credentialing process and create a cost shift from the state to each IHE offering credentialing programs.** With the implementation in 2005 of the CCTC college and university online recommendation process, the redundancy that may have existed in the old system has been eliminated. There is a benefit to having only one entity issuing documents and only one entity storing the data. With the state issuing credentials there is a consistency across the 94 institutions that offer teacher preparation programs. University recommendations make up about 20% of the current CCTC workload.
Devolve Remaining Credential Responsibility to COEs	**LAO recommendation would create a state mandated local cost to counties and increase potential for fraud.** County personnel do not review every application the CCTC receives. They review approximately 50%. This would mean that the county's workload would increase. What consistency would exist from one county to another? Would this increase the possibility of fraudulent documents? The feasibility study report for the proposed Teacher Data System points out a need for a centralized source for the HOUSSE data. If the employing agencies desire a central source for HOUSSE data, why would they then want to decentralize credential data?

Monitoring Teacher Conduct

LAO Issue	CCTC Comments
Fingerprint Teachers Once at County Level. **Eliminate Committee of Credentials' Review and Recommendation Process As Well As the Commission's Final Decision Making Process**	**LAO proposal compromises student safety and jeopardizes teacher due process.** If a criminal record exists, the Department of Justice (DOJ) provides a criminal history which results in a review by CCTC to determine if the criminal history prevents the applicant from obtaining a credential. CCTC also obtains licensing information regarding adverse actions taken by other states. Based on this information CCTC completes a fitness review. Under current law, most criminal convictions fall under a "discretionary" review category whereby CCTC determines whether the teacher is fit to be granted a credential. When an allegation of misconduct that did not result in a criminal conviction occurs, CCTC completes an investigation and review of the case to assure that the applicant had not been terminated or resigned from employment due to the misconduct in this state or another state. County Offices of Education (COE) do not have any of these processes in place.

Eliminate Committee of Credentials' Review and Recommendation Process As Well As the Commission's Final Decision Making Process (continued)	In addition to fingerprint checks, CCTC also conducts fitness reviews which are begun when a triggering event occurs including when CCTC receives a rap sheet on an applicant or credential holder, when an applicant answers 'yes' to one of the character and fitness questions on the credential application, or when another state verifies that the applicant holds a license but is not in good standing in the verifying state. The fitness review is an evaluative process to determine if the applicant is eligible to receive a credential or if the credential holder is eligible to maintain the credential held. It is not clear how CDE would obtain jurisdiction to review discipline cases without fingerprinting/criminal history, and information currently obtained as a result of a review of fitness questions on the credential application. The Committee of Credentials is the avenue through which an applicant or a holder is afforded her/his due process right to an administrative hearing. It is unclear from the report at what point this would take place at CDE.
Fund Monitoring Activities With Test Fee Revenue	**LAO jeopardizes funding for teacher examinations.** Currently, in accordance with Education Code §44253.8 the CCTC charges examination fees "that are sufficient to recover the costs of developing and administering the examinations, including the costs of periodic studies of the examinations, except to the extent that these costs are recovered by appropriations from another source of funds." It is unclear whether these fees could support disciplinary activities in addition to complying with the statutory mandate to support exam activities.